

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI**

**WANDA BRANDON, ET AL.**

**Plaintiffs,**

**vs.**

**BOARD OF EDUCATION  
OF THE CITY OF ST. LOUIS, ET AL.**

**Defendants.**

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**Case No.: 4:22-cv-00635-SRC**

**Jury Trial Demanded**

**PLAINTIFFS' MOTION TO FILE AMENDED COMPLAINT**

Plaintiffs move pursuant to Rule 15 of the Federal Rules of Civil Procedure for leave to file their First Amended Complaint, attached hereto. Rule 15 provides that a party may amend its pleading with the court's leave and that "[t]he court should freely give leave when justice so requires." Fed. R. Civ. P. 15(a)(2). There has been no scheduling order in this action and no deadlines have been set for filing amended complaints. Allowing Plaintiffs to file the Amended Complaint will serve justice and promote judicial efficiency. Further, there would be no substantial or undue prejudice, bad faith, undue delay, or futility to the defendants in this action.

Plaintiffs seek to add additional plaintiffs to this action. The additional plaintiffs are similarly situated to the current plaintiffs and have identical claims against the defendants to this action based on the same series of facts and occurrences. The same questions of law and facts apply to all plaintiffs in this action. The additional plaintiffs are proper plaintiffs to be joined pursuant to Rule 20 of the Federal Rules of Civil Procedure.

The amended complaint also adds additional counts including violations of the Plaintiffs' Constitutional right to equal protection under the law protected by the Fourteenth Amendment, violations of the Missouri Religious Freedom Restoration Act, Section 1.302 R.S.Mo., and

violations of Section 188.100-120 R.S.M.O. for discrimination against Plaintiffs for their refusal to participate in abortions.

Wherefore, plaintiffs move for leave to file their First Amended Complaint including adding the additional named plaintiffs as parties to this action, and for such other and further relief as the court deems just and proper.

Respectfully submitted,

**KASPER LAW FIRM, LLC**

By: /s/ Kevin J. Kasper

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*ATTORNEYS FOR PLAINTIFF*

**CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was served by filing with the court's electronic filing system which sends notice to all parties of record.

/s/ Kevin J. Kasper